

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

COMMONWEALTH OF  
MASSACHUSETTS, *et al.*,

Plaintiffs,

v.

NATIONAL INSTITUTES OF  
HEALTH, *et al.*,

Defendants.

Civil Action No. 25-CV-10338-AK

**NOTICE OF WITHDRAWAL**

PLEASE TAKE NOTICE that, pursuant to Local Rule 83.5.2, Brian C. Lea of the United States Department of Justice is withdrawing his appearance as counsel for Defendants in this matter. Defendants will continue to be represented by the other Department of Justice attorneys who have entered appearances.

Dated: January 8, 2026

Respectfully submitted:

BRETT A. SHUMATE  
Acting Assistant Attorney General

LEAH B. FOLEY  
United States Attorney

By: /s/ Brian Charles Lea  
Brian Charles Lea  
Ga. Bar No. 213529  
Deputy Associate Attorney General  
U.S. Department of Justice  
Office of the Associate Attorney General  
Main Justice Bldg.  
960 Pennsylvania Avenue, NW  
Washington, D.C. 20530  
(202) 445-8823  
Brian.Lea@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: January 8, 2026

/s/ Brian Charles Lea  
Brian Charles Lea  
Deputy Associate Attorney General